

KRISTINA M. ZINNEN, Bar No. 245346  
CRAIG L. SCHECHTER, Bar No. 308968  
WEINBERG, ROGER & ROSENFELD  
A Professional Corporation  
1375 55th Street  
Emeryville, California 94608  
Telephone (510) 337-1001  
Fax (510) 337-1023  
E-Mail: courtnotices@unioncounsel.net  
kzinnen@unioncounsel.net  
cschechter@unioncounsel.net

Attorneys for Plaintiffs

CHRISTOPHER C. WHEELER, Bar No. 224872  
FARELLA BRAUN + MARTEL LLP  
235 Montgomery Street  
San Francisco, California 94104  
Telephone (415) 954-4979  
E-Mail: cwheeler@fbm.com

Attorney for Defendants

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA DISTRICT OF CALIFORNIA

THE BOARD OF TRUSTEES, in their  
capacities as Trustees of the LABORERS  
HEALTH AND WELFARE TRUST FUND  
FOR NORTHERN CALIFORNIA; et al.,

Plaintiffs,

v.

IQBAL BANO KHAN and MOHAMMED  
KHAN, individually and doing business as  
SIERRA BUILDING MAINTENANCE; et al,

Defendants.

No. 4:21-cv-01176-DMR

**JOINT STIPULATION TO CONTINUE  
FURTHER CASE MANAGEMENT  
CONFERENCE; ORDER (AS MODIFIED)**

Date: June 1, 2022  
Time: 1:30  
Dept.: ZOOM webinar  
Judge: Hon. Donna M. Ryu

**TO THE HONORABLE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF  
RECORD:**

Plaintiffs the Board of Trustees, in their capacities as Trustees of the Laborers Health and Welfare Trust Fund for Northern California; Laborers Vacation-Holiday Trust Fund for Northern California; Laborers Pension Trust Fund for Northern California; and Laborers Training and Retraining Trust Fund for Northern California (“Trust Funds” or “Plaintiffs”), by and through

their counsel, and Defendants, Iqbal Bano Khan and Mohammed Khan, individually and doing business as Sierra Building Maintenance; Sierra Building Maintenance; Sierra Building Maintenance, LLC, a Nevada LLC registered to do business in California; and Does 1-10, inclusive, by and through their counsel, hereby stipulate and agree as follows:

WHEREAS, a further Case Management Conference is scheduled in the above-entitled matter for June 1, 2022;

WHEREAS, a Settlement Conference is scheduled in the above-entitled matter for July 11, 2022;

WHEREAS, the Parties are actively engaged in settlement discussions;

WHEREAS, the Parties respectfully submit that judicial economy would be best served if the currently-scheduled further Case Management Conference be continued for approximately 60 days to allow the Parties to continue working towards a settlement prior to the Court expending additional judicial resources on this matter.

**IT IS HEREBY STIPULATED AND PROPOSED BY THE PARTIES AS FOLLOWS:**

1. The Parties stipulate to and jointly propose that the currently-scheduled further Case Management Conference be continued until August 3, 2022.

Dated: May 16, 2022

WEINBERG, ROGER & ROSENFELD  
A Professional Corporation

By: /S/ Craig L. Schechter  
CRAIG L. SCHECHTER  
KRISTINA M. ZINNEN

Attorneys for Plaintiffs

Dated: May 16, 2022

FARELLA BRAUN + MARTEL LLP

By: /S/ Christopher C. Wheeler  
CHRISTOPHER C. WHEELER

Attorney for Defendants

**ECF ATTESTATION**

Pursuant to Local Rule 5-1(h)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from each of the other signatories thereto.

Dated: May 16, 2022

By: /S/ Craig L. Schechter  
CRAIG L. SCHECHTER

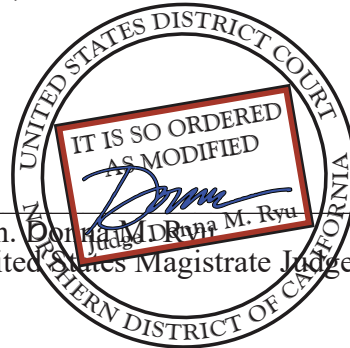
**ORDER (AS MODIFIED) CONTINUING FURTHER CASE MANAGEMENT CONFERENCE**

Pursuant to Stipulation, IT IS ORDERED that the Further Case Management Conference set for June 1, 2022 at 1:30 p.m. is continued to August 3, 2022 at 1:30 p.m. in Oakland by Videoconference only before Magistrate Judge Donna M. Ryu. Parties shall file an updated joint case management conference statement by July 27, 2022.

IT IS SO ORDERED AS MODIFIED.

Dated: May 19, 2022

By: Hon. Donna M. Ryu  
United States Magistrate Judge



150388/1270159